

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

**Keith R. Crumley, by Next Friend  
Shirley CRUMLEY,**

**Plaintiff,**

**V.**

**Kerry J. FORESTAL, in his official capacity  
as the Sheriff of Marion County, et al.**

## Defendants.

**Case No. 1:19-cv-04110-TWP-DML**

## **NOTICE OF FILING AMENDED COMPLAINT**

Plaintiff Keith R. Crumley, by his Next Friend Shirley Crumley and through counsel, respectfully notifies the Court of the filing of his First Amended Complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, and in support states as follows:

1. The only amendments to Plaintiff's attached Amended Complaint are to substitute the City of Indianapolis as the proper defendant for the Indianapolis Metropolitan Police Department and Chief of Indianapolis Police Dept. and to remove the claim pursuant to Section 504 of the Rehabilitation Act against Correct Care Solutions (aka Wellpath) per the Court's recent Order on Joint Stipulation of Dismissal. (Dkt. 79.)
2. Counsel for all parties have been contacted and consent to the filing of the attached Amended Complaint in accordance with Rule 15(a)(2) of the Federal Rules of Civil Procedure.
3. All parties consent to the filing of the attached Amended Complaint on the basis that the forthcoming Order on the Partial Motion for Judgment on the Pleadings filed by Defendants Correct Care Solutions and Teresa Pierce (dkt. 38), and all responses in opposition and reply in support (dkt. 48, 49), shall be applied with full effect as to Plaintiff's Amended Complaint.

4. The City of Indianapolis will suffer no prejudice by the filing of this Amended Complaint as it has been on notice of this pending litigation through service to the Indianapolis Metropolitan Police Department and Chief of Police, Brian Roach, in his Official Capacity and representation by the Corporation Counsel.

Respectfully submitted,

/s/ Nikki G. Gray

Nikki G. Gray

Indiana Disability Rights

*Counsel for Plaintiff*